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January 22, 2019

VIA ECF AND FIRST-CLASS MAIL

Hon. Mark Falk, U.S.M.J.
 United States District Court for the District of New Jersey
 Martin Luther King Jr. Bldg. & U.S. Courthouse
 50 Walnut Street
 Newark, New Jersey 07102

Re: *Amgen Inc., et al. v. Adello Biologics, LLC*
Civil Action No. 2:18-cv-03347 (CCC)(MF)

Dear Judge Falk:

This firm, together with Paul, Weiss, Rifkind, Wharton & Garrison LLP, represents Plaintiffs Amgen Inc. and Amgen Manufacturing Limited (collectively "Amgen") in connection with the above-referenced matter. Amgen along with Adello Biologics, LLC ("Adello") and Amneal Pharmaceuticals, LLC and Amneal Pharmaceuticals, Inc. (together, "Amneal") jointly submit the below schedule for the Court's consideration, and respectfully request that it be entered.¹

The parties met and conferred, and respectfully submit the below amended case schedule for the Court's consideration:

Event	Scheduling Order Date (Dkt. No. 69)	Proposed Date
Amneal's invalidity contentions and related document production	December 21, 2018	45 days after service of Amgen's infringement contentions
Amneal's non-infringement contentions and related document production	December 21, 2018	45 days after service of Amgen's infringement contentions

¹ The parties are currently in negotiations regarding Plaintiffs' Second Amended Complaint as well as amended contentions as to Adello and initial contentions as to Amneal, and Amgen anticipates submitting a request to the Court as to the Second Amended Complaint and contentions, on consent, in the near future. With that understanding, the parties have agreed to the deadlines in the proposed schedule for responding to the contentions.

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Event	Scheduling Order Date (Dkt. No. 69)	Proposed Date
Adello's amended invalidity contentions and related document production	N/A	45 days after service of Amgen's amended infringement contentions
Adello's amended non-infringement contentions and related document production	N/A	45 days after service of Amgen's amended infringement contentions
Amgen's response to Amneal's invalidity contentions	January 14, 2019	15 days after service of Amneal's invalidity contentions
Amgen's response to Adello's amended invalidity contentions	N/A	15 days after service of Adello's amended invalidity contentions
Exchange proposed terms for claim construction	January 22, 2019	February 14, 2019
Exchange preliminary proposed claim constructions and supporting intrinsic and extrinsic evidence	February 5, 2019	February 27, 2019
Exchange intrinsic and extrinsic evidence that each party intends to rely upon to oppose other party's proposed construction	February 19, 2019	March 12, 2019
Meet-and-confer to narrow the issues and to finalize preparation of a Joint Claim Construction and Prehearing Statement	February 25, 2019	March 15, 2019
Joint Claim Construction and Prehearing Statement	March 4, 2019	March 22, 2019
Deadline for substantial completion of document production	March 18, 2019	April 1, 2019
Complete claim construction discovery, other than experts	March 25, 2019	April 5, 2019
Opening <i>Markman</i> briefs and supporting evidence	April 8, 2019	April 15, 2019
Discovery from experts submitting <i>Markman</i> declaration	May 6, 2019	May 10, 2019

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All remaining deadlines in the Court's Scheduling Order (Dkt. No. 69) shall remain unchanged.

Should the parties' proposed amended case schedule meet with Your Honor's approval, we respectfully request that this letter be "So Ordered" and entered on the docket. Of course, should Your Honor require additional information, we will file a formal application at the Court's direction.

We thank the Court for its consideration, and should Your Honor or Your Honor's staff have any questions, we are always available.

Respectfully submitted,

s/Liza M. Walsh

Liza M. Walsh

cc: All Counsel of Record (via ECF and Email)

SO ORDERED:



Hon. Mark Falk, U.S.M.J.

1/23/19